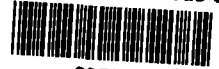




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



235273

923312

REPLY TO THE ATTENTION OF  
HSE-50

**MEMORANDUM**

DATE: OCT 10 1990

SUBJECT: Request for a Time Critical Removal Action at the  
Midland Machine in Decatur, Illinois

FROM: Fred R. Bartman  
On Scene Coordinator

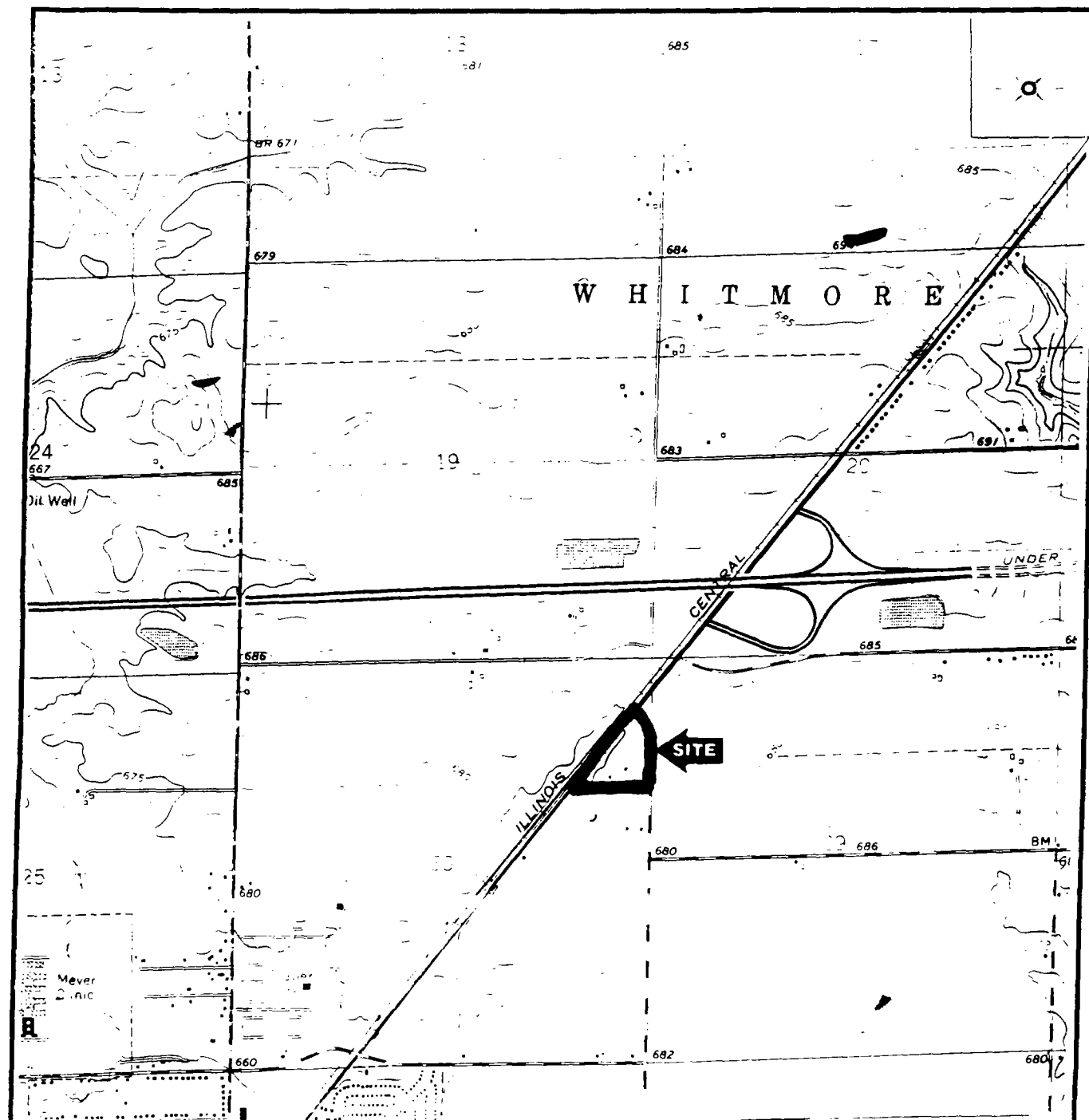
TO: Rick Karl, Chief  
Emergency Response Branch

THRU: Brad Benning, Chief  
Response Section II

Site ID # B5F7

**I. PURPOSE**

The purpose of this Action Memo is to request and document approval of a time critical removal action for the Midland Machine site in Decatur, Illinois (Figure 1). This action is necessary to abate an immediate threat to public health and the environment due to the presence of approximately one hundred thirty drums containing primarily flammable organic liquid. The proposed action is for drum removal and disposal and the excavation of contaminated soil. Region 5 estimates that this removal action will take 10 days and will cost \$86,000, \$68,000 of which will be used for Emergency Response & Removal Service (ERRS).



Quadrangle Location



**EPA U.S. EPA Region 5**  
**EMERGENCY AND ENFORCEMENT RESPONSE BRANCH**

Site Location Map		FIGURE	1
SITE	Midland Machine	TDD	S05-9909-004
CITY	Decatur	STATE	Illinois
SOURCE: U.S.G.S. 7.5 minute topographic map. Forsyth, IL Quadrangle		SCALE	1:24,000
		DATE	1967
		REVISED	1975

## II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : ILSFN0507932

### A. Removal Site Evaluation

The Midland Machine site is located in a commercial area on approximately five acres of land situated between Brush Collège Road on the east and Illinois Route 48 on the West (See Figure 2). An environmental justice analysis (Attachment I) indicates a population of 1102 within a one mile radius of the site. This population is 42% low income with no minorities.

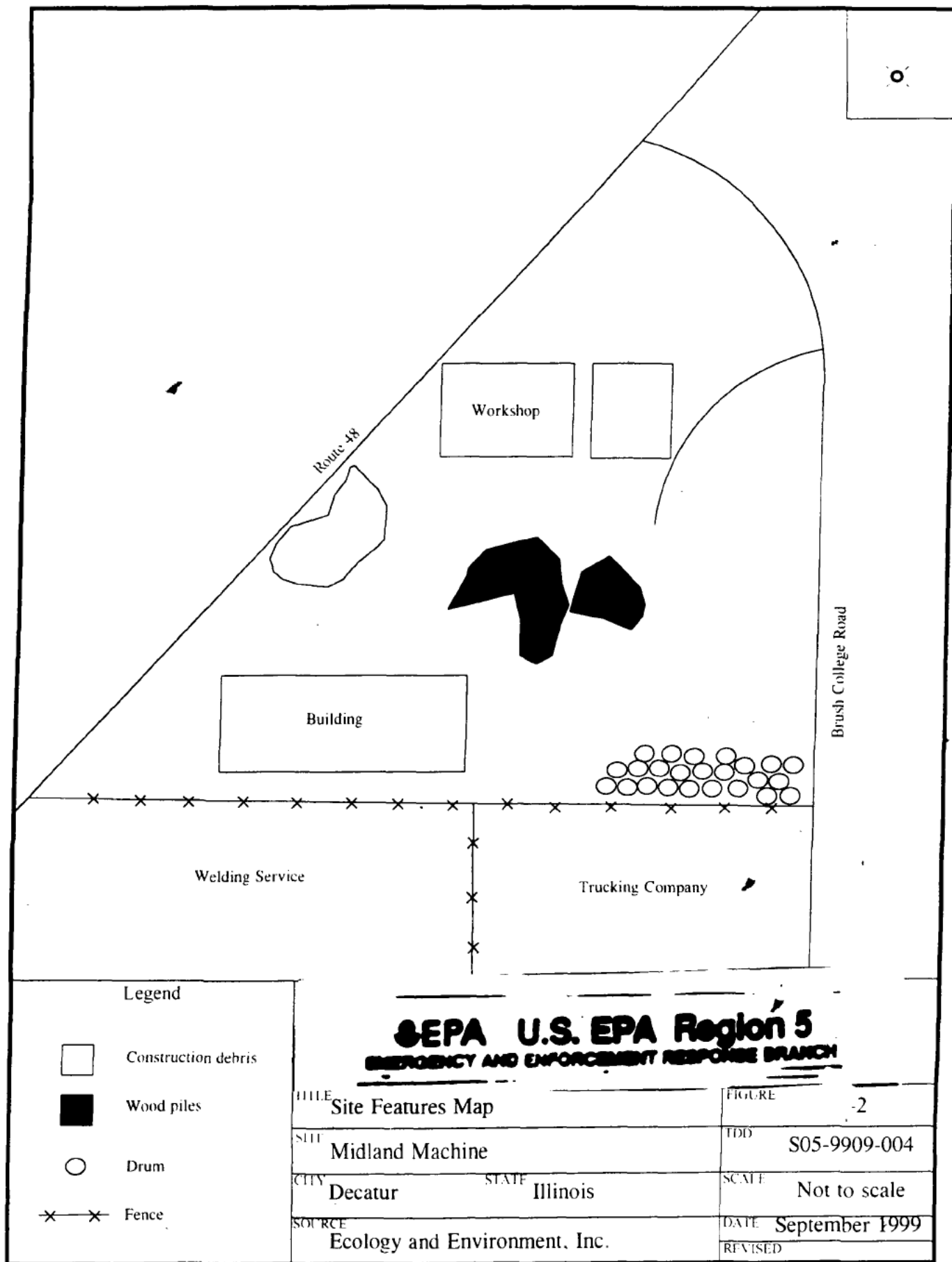
██████████ owns the property. He operates a small machine shop on the property and also lives there. ██████████ obtains water from an onsite well and generates his own heat and electricity with a diesel generator which he fuels with bulk fuel. Before ██████████ father died in 1983, his father used to collect waste oil and process it on this site in a cracker to make fuel for the generator. According to ██████████, his father collected the drums which are now on site and then rejected them when he discovered that they did not contain waste oil. These drums contain waste inks, waste solvent and some crankcase oil.

In 1993, IEPA overpacked the drums and randomly selected three drums for analysis. Analytical results indicated the presence of highly flammable material with a flash point of less than 70 degrees Fahrenheit. The analysis also revealed high levels of toluene and xylene.

IEPA identified two generators, Grigolet and the Decatur Herald, and notified them that they were potentially responsible parties. The Decatur Herald removed and disposed of several drums which contained waste ink. Grigolet has not removed any drums. In late 1998, IEPA filed a cost recovery action in federal district court against both the Decatur Herald and Grigolet. That action is currently in the discovery stage.

On August 19, 1999, the IEPA referred the site to USEPA. On September 9, 1999, USEPA and START conducted a removal site assessment. Region 5 randomly selected five drums for sampling and analyzed them for volatile and semi-volatile organic compounds (VOCs & SVOCs), poly chlorinated bi phenyls (PCBs), flashpoint, pH and metals. One soil composite was also analyzed for SVOCs, metals and PCBs. ██████████ onsite well was also sampled for VOCs, SVOCs, PCBs, pesticides and metals.

Results confirmed the presence highly flammable organic liquids with a flashpoint of less than 50 degrees Fahrenheit. This waste is characterized as a hazardous waste (D001) as defined under RCRA (CFR 261).



Approximately one hundred thirty drums remain on the Midland Machine property. These drums are in poor condition and some are leaking. The drums are staged on plastic and are located in a low area where surface water tends to accumulate. This area then drains to a drainage ditch along Brush College Road.

## **B. State and Local Authorities Role**

### **1. State and Local Action to Date**

In 1993, IEPA randomly selected three of the drums for analysis, confirmed the presence of hazardous waste, overpacked the drums, and sealed the site.

In late 1998, IEPA filed a cost recovery action in federal district court against two generators. That action is currently in the discovery stage.

In 1999, IEPA sent a letter to Region 5 requesting assistance in removing the drums.

### **2. Potential for Continued State/Local Response**

IEPA will continue to pursue its cost recovery action against the two generators and will assist USEPA in any further action. It does not appear that the State of Illinois will contribute funds towards a removal action.

## **III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES**

The following conditions at the Midland Machine site warrant an appropriate removal action as set forth in paragraph (b) (2) of Section 300.415 of the National Contingency Plan (NPL):

### **(a) Hazardous substances in drums may pose a threat of a release**

The site contains approximately 130 overpacked 55 gallon drums that contain flammable organic liquids. The overpacked drums are leaking or otherwise deteriorating and show signs of leaking. These drums are currently releasing or threatening to release hazardous substances into the environment.

### **(b) Threat of fire or explosion;**

The highly flammable contents of the drums could cause a fire and/or explosion. A fire or explosion could impact

nearby businesses and [REDACTED] residence/business.

- (c) High levels of hazardous substances in soils largely at or near the surface, that may migrate

The drums are leaking or otherwise deteriorating. The nearby soils are visibly stained and the vegetation is stressed from the waste leaking out of the drums. The drums are located in a low area where water ponds up. This water then drains offsite to a drainage ditch along Brush College Road. The leaking drums contain hazardous substances which could potentially impact groundwater and [REDACTED] drinking water well.

- (d) Weather conditions that may cause hazardous substances to migrate or be released

The drums are open to the atmosphere and constantly exposed to the weather. The drums are in a low area and occasionally are in standing water. Exposure to the weather and water accelerates the degradation of the drums which may cause additional releases.

#### IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the hazardous substances on-site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this site may present an imminent and substantial endangerment to public health or welfare or the environment, unless the response action selected in this Action Memorandum is implemented. Implementation of the response action selected in this Action Memorandum will mitigate the actual or threatened release of hazardous substances from this site.

Region 5 and IEPA have documented the presence of unsecured hazardous substances on this site. The deteriorating state of the drums containing highly flammable material could result in a fire and/or explosion that could potentially impact [REDACTED] property and nearby businesses. The drums containing hazardous substances are leaking and potentially releasing hazardous substances which may migrate offsite and/or impact [REDACTED] well.

## **V. PROPOSED ACTIONS AND ESTIMATED COSTS**

### **A. Proposed Action**

#### **1. Proposed Action Description**

The proposed action will abate the threat to human health and the environment by shipping the hazardous substances off-site for proper treatment and disposal. Specific removal action tasks are as follows:

- ❖ Prepare workplan and site health and safety plan;
- ❖ Secure site during course of removal;
- ❖ Identify hazardous waste categories from drum wastes as necessary and collect composite samples to arrange for transportation and disposal;
- ❖ Package and ship drum wastes for treatment and/or disposal;
- ❖ Excavate and dispose of contaminated soils near leaking drums;
- ❖ All offsite disposal conducted in accordance with the USEPA offsite rule (40 CFR 300.440).

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances at the site which pose an imminent and substantial endangerment to public health and safety and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

#### **2. Contribution to Remedial Performance**

The proposed action will remove all hazardous substances from the site, eliminating any long term threats posed through direct contact with hazardous substances found on-site.

#### **3. Description of Alternative Technologies**

On-site treatment of hazardous substances found at the site would not be cost effective. Start-up and equipment costs incurred would not be offset by transportation and disposal savings because of the relatively small volume of waste.

#### 4. Applicable or Relevant and Appropriate Requirements (ARARs)

Federal ARARs applicable to the site are the Resource Conservation and Recovery Act (RCRA) and Toxic Substances Control Act (TSCA). All ARARs of federal law will be complied with to the extent practicable. Region 5 sent a letter to the State of Illinois requesting a list of ARARs for the recommended removal. Any state ARARs identified in a timely manner for this removal action will be complied with to the extent possible.

#### 5. Project Schedule

Region 5 expects the removal action to take approximately two months, 10 days of which will be spent on-site.

#### 6. Post Removal Site Control

Completion of removal activities at the Midland Machine site will eliminate direct contact threats to the public and any need for post removal site controls.

#### B. Estimated Costs

Region 5 estimates this removal action will cost approximately \$86,000, \$68,000 of which will be used for ERRS. The detailed ERRS contractor costs and initial cost projection are presented in attachment IV. The removal project ceiling estimate is presented below:

##### Project Ceiling Estimate

##### EXTRAMURAL COST

ERRS Contractor	\$51,382
ERRS Contingency (15%)	\$7,707
Subtotal	\$59,089
START COST	\$6,000
Subtotal	\$65,089
Extramural Contingency (15%)	\$9,763
Total, Extramural	\$74,852

##### INTRAMURAL COST

Government Direct (100 hours x \$30)	\$ 3,000
Government Non-Direct (100 hours x \$63)	\$ 6,300
Per diem	\$ 1,950
Total Intramural	\$ 11,250
Total Ceiling Estimate	\$ 86,102



**VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN.**

Delayed action could potentially increase public health risks as containers could further deteriorate leading to an additional release of their contents.

**VII. OUTSTANDING POLICY ISSUES**

None

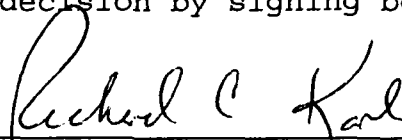
**VIII. ENFORCEMENT**

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential addendum (Attachment II).

**IX. RECOMMENDATIONS**

This decision document represents the selected removal action for the Midland Machine site in Decatur, Illinois. This decision document was developed in accordance with CERCLA as amended, and is not inconsistent with the National Contingency Plan (NCP). This decision is based on the Administrative Record for the site (See Attachment III). Conditions at the site meet the NCP Section 300.415 (b) (2) criteria for a removal action and I recommend your approval of the proposed removal action. The total project ceiling if approved will be \$ 86,000. Of this, an estimated \$ 68,000 may be used for cleanup contractor costs. Please indicate your decision by signing below.

APPROVE:



Richard C. Karl, Chief  
Emergency Response Branch

DATE: 10-1-99

DISAPPROVE:

Richard C. Karl, Chief  
Emergency Response Branch

DATE: \_\_\_\_\_

**Attachments**

- I. Environmental Justice
- II. Enforcement Confidential Addendum
- III. Administrative Record Index
- IV. ERRS Cost Estimate

cc: K. Mould, EPA HQ, 5202G  
Mike Chesik, Regional Environmental Officer  
U.S. Department of Interior, Room 217  
200 Chestnut Street, Philadelphia, PA 19106  
B. Everetts, IEPA

MIDLAND MACHINE SITE  
ORIGINAL AR

DOCUMENT #7

"Action Memorandum: Request for a Time-Critical Removal  
Action at the Midland Machine Site".

BCC PAGE

**REDACTED**

**NOT RELEVANT TO THE SELECTION OF  
THE REMOVAL ACTION**

MIDLAND MACHINE SITE  
ORIGINAL AR

DOCUMENT #7

"Action Memorandum: Request for a Time-Critical Removal  
Action at the Midland Machine Site".

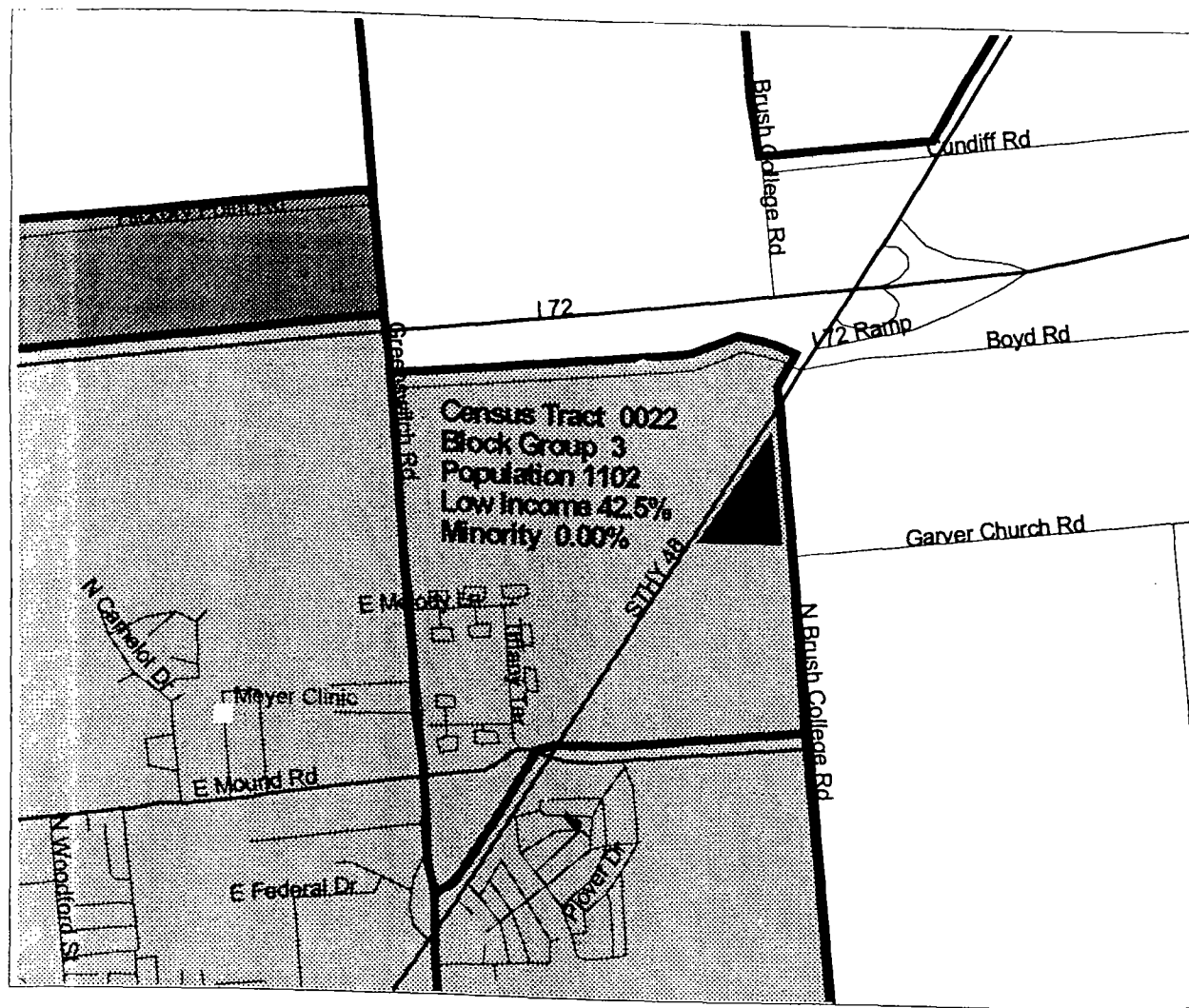
ATTACHMENT II  
ENFORCEMENT ADDENDUM  
3 PAGES

**REDACTED**

NOT RELEVANT TO THE SELECTION OF  
THE REMOVAL ACTION

# Region 5 Superfund EJ Analysis

## Midland Machine Site      Decatur, IL

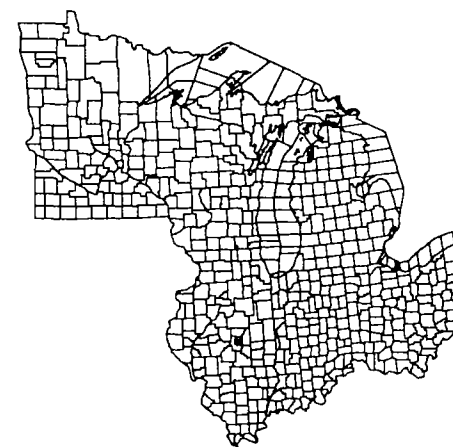


### EJ Identification

- Low Income and Minority Less than State Average
- Low Income or Minority at or Greater than State Average
- Low Income or Minority 2 Times or Greater than State Average  
[ meets Region 5 EJ Case criteria ]

- Site Location
- Block Group Boundary

Region 5 EJ Case Criteria for Illinois  
Minority: 54% or greater  
Low Income: 50% or greater



U.S. EPA Region 5  
Superfund EJ  
Analysis

Date of Map: 9/22/99

Source of Map: 1990 Census Database

ATTACHMENT III

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL ACTION

ADMINISTRATIVE RECORD  
FOR  
MIDLAND MACHINE SITE  
DECATUR, ILLINOIS

SEPTEMBER 28, 1999

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	09/11/89	Jansen, D. & S. Townsend, Illinois EPA	King, G., Illinois EPA	Memorandum re: August 3, 1989 Inspection at the Midland Machine Site	6
2	08/13/90	Killian, B., Illinois EPA	Midland Machine	Illinois Seal Order for the Midland Machine Site	5
3	04/29/99	Doubet, S., Illinois EPA	File	Memorandum re: April 27, 1999 Inspection at the Midland Machine Site	8
4	08/19/99	Everetts, B., Illinois EPA	Borries, S., U.S. EPA	Letter re: Illinois EPA's Request for U.S. EPA Assistance at the Midland Machine Site	1
5	09/23/99	Ecology and Environment, Inc.	U.S. EPA	FAX Transmission re: Preliminary Analytical Report for the Midland Machine Site	5
6	00/00/00	Ecology and Environment, Inc.	U.S. EPA	Site Assessment Report for the Midland Machine Site <b>(PENDING)</b>	
7	00/00/00	Bartman, F., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for a Time Critical Removal Action at the Midland Machine Site <b>(PENDING)</b>	

ATTACHMENT IV

ERRS CONTRACTOR COSTS  
MIDLAND MACHINE  
DECATUR, ILLINOIS

PERSONNEL	\$17,256
EQUIPMENT	\$5,985
DISPOSAL	\$28,141
TOTAL	\$51,382